

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA, :  
 :  
 PLAINTIFF, :  
 : CASE No. 2:11-CR-52  
 vs. : JUDGE ECONOMUS

CHRISTOPHER B. THOMPSON, :  
 :  
 DEFENDANT. :

- - - - -

UNITED STATES OF AMERICA, :  
 :  
 PLAINTIFF, :  
 : CASE No. 2:11-CR-128  
 vs. : JUDGE GRAHAM

JASON R. CAINES, et al., :  
 :  
 DEFENDANTS. :

UNITED STATES MOTION FOR RECONSIDERATION OF RELATED  
CASE DETERMINATION AND FOR CONSOLIDATION

Now comes the United States and moves this Court for a reconsideration of the related case determination in the above styled cases and for a consolidation of the earlier case with the later case for the reasons in the attached Memorandum in Support.

Respectfully submitted,

CARTER M. STEWART  
United States Attorney

s/Deborah A. Solove  
DEBORAH A. SOLOVE (0024552)  
Assistant United States Attorney  
303 Marconi Boulevard, Ste. 200  
Columbus, Ohio 43215  
(614) 469-5715  
Fax: (614) 469-5653  
Deborah.Solove@usdoj.gov

**MEMORANDUM IN SUPPORT**

The United States indicted Christopher B. Thompson who was the organizer of an extensive conspiracy of individuals traveling to Florida to obtain oxycodone for later distribution in the central Ohio area. It later indicted fifteen members of that conspiracy and indicated that the cases were related to the Christopher B. Thompson case. The cases, however, were not assigned to the same judges. (R. 55, CR2-11-128)

Currently, five of the conspirators have been sentenced by Judge Graham in Case No. CR2:11-128. It is clear that Judge Graham has become well acquainted with the scope of and the individuals involved in the conspiracy. The sentences have, over objections by the United States, been significant downward variances from the guidelines ranges. In fairness, all of the conspirators including the organizer, Christopher B. Thompson, should be sentenced by the same judge.

This request has been discussed with counsel for Christopher B. Thompson, David Rieser, who has stated that he has no objection to the consolidation of these cases.

Accordingly, for good cause shown, the United States moves for a reconsideration of the related case decision.

Respectfully submitted,

CARTER M. STEWART  
United States Attorney

s/Deborah A. Solove  
DEBORAH A. SOLOVE (0024552)  
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served this 29th day of November, 2011, electronically, on all counsel of record.

s/Deborah A. Solove  
DEBORAH A. SOLOVE (0024552)  
Assistant United States Attorney